

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 25-30002
)	(Chapter 11)
GENERATIONS ON 1ST, LLC)	
)	
Debtor)	
_____)	
In re:)	Case No. 25-30003
)	(Chapter 11)
PARKSIDE PLACE, LLC)	
)	
Debtor)	
_____)	Jointly Administered

MOTION TO EXPEDITE THIRD CASH COLLATERAL HEARING

Come now Generations on 1st, LLC (“Generations”) and Parkside Place, LLC (“Parkside”) (collectively, the “Debtors,” and each a “Debtor”), by and through undersigned proposed counsel, pursuant to Local Rule 9006-1, and move this Honorable Court to hold an expedited hearing, in consideration of the Debtors’ Third Motion for Leave to Use Cash Collateral (the “Third Cash Collateral Motion,” as found at DE #137), and in support thereof state as follows:

As set forth in the Third Cash Collateral Motion, the terms underlying the Debtors’ use of cash collateral are presently set to expire on August 15, 2025. The Debtors operate eponymous apartment buildings in Watertown, South Dakota and require the use of rental proceeds to manage the properties—both for the benefit of the maintenance of the assets themselves and, too, for the benefit of the myriad tenants occupying the two buildings. RRSB appears to have a lien on those rents (albeit one that is contested) and, accordingly, approval of any forward-looking use of cash collateral is critical to the preservation of these two estates and the reorganizational ambitions of both Debtors.

The Local Rules of this Honorable Court permit expedited hearings. Local Rule 9006-1. Consistent with those rules, the Debtors submit as follows:

- a. The grounds of the Third Cash Collateral Motion are set forth therein (albeit incorporating, by reference, the grounds set forth in the original cash collateral motion);
- b. The Debtors propose a hearing date of Monday, August 18, 2025, at a time of this Honorable Court's choosing, for the Third Cash Collateral Motion; and
- c. The Debtors propose responses to the Third Cash Collateral Motion be due by 5:00 pm prevailing central time on Friday, August 15, 2025.

Finally, the Debtors note that discussions with counsel for RRSB are ongoing and there is not yet a consensus as to a hearing date, with there being genuine concerns about the availability of counsel for RRSB on August 18. The date is being proposed because it is the first business day after the existing cash collateral stipulation expires and because an inability to use cash collateral, for any period of time, would have potentially catastrophic consequences not merely upon the debtors' businesses but, too, upon the scores of tenants occupying the Debtors' buildings. However, if an alternative date can be agreed upon, inclusive of any bridge stipulation, the Debtors will promptly apprise this Honorable Court and, if need be, seek a continuance of any deadlines established through an order granting this motion.

[Signature on Following Page]

Respectfully Submitted,

Dated: August 6, 2025

By: /s/ Maurice B. VerStandig
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of August, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig